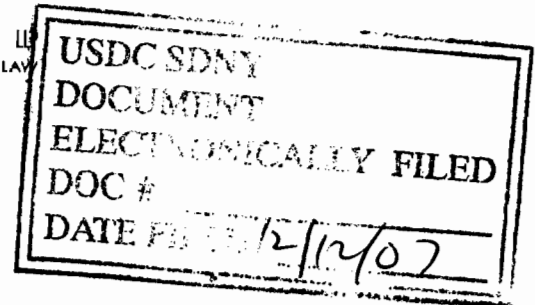


Phone: (212) 885-5270  
Fax: (917) 332-3795  
Email: TBelknap@BlankRome.com

BLANK

ROME  
COUNSELORS AT LAW



December 11, 2007

By Fax – (212) 805-7942

Hon. Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Room 1050  
New York, New York 10007

1. The pre-trial conf. is canceled.  
2. Pursuant to R. 4(m), Fed.R.Civ.P.,  
and Supp. Adm. R. A(2), time to effect  
service is extended 60 days, to Feb. 3,  
2008. If not made by then, the action  
will be dismissed, without prejudice.  
12.11.07

Re: Angoalissar LDA, v. Trident International Trading Corp., (MV/ARION)  
S.D.N.Y. 07 Civ. 7028 (AKH)  
Our Ref. No. 128010-00601

Dear Judge Hellerstein,

We represent Plaintiff in the above-referenced matter. We write to request an adjournment of the pre-trial conference presently scheduled in this matter for December 14, 2007 at 9:30 a.m. We also request that the Court extend Plaintiff's time to serve the Complaint, if required, for another 120 days.

This is an admiralty action under Supplemental Admiralty Rule B of the Federal Rules of Civil Procedure. Plaintiff filed its Complaint on August 6, 2007 seeking attachment of \$559,000.00. This Court issued an Order directing the Clerk to issue a Writ of Attachment in that amount on August 7, 2007.

Although Plaintiff has been continuously serving its Writ of Attachment upon the various garnishee banks, to date no funds have been attached. Accordingly, Plaintiff respectfully submits there is no need for a pre-trial conference at this time. If Plaintiff is successful in attaching funds, Defendant is entitled to request a "prompt hearing" pursuant to Supplemental Admiralty Rule E (4)(f). No additional litigation is anticipated to be required unless funds are attached.



December 11, 2007  
Page 2

Furthermore, because no funds have been attached, and because the attachment proceedings have to date proceeded "ex parte" in order to protect Plaintiff's ability to attach funds, Plaintiff has not yet attempted to serve a copy of the complaint upon the Defendant. As noted above, this is consistent with the principle that a Defendant must be given "prompt" notice of an attachment pursuant to Local Rule B.2 and is entitled to a prompt hearing to respond to an attachment if and when it occurs. Accordingly, Plaintiff respectfully requests that, to the extent required under the Federal Rules, its time to serve the Complaint upon the Defendant be extended for an additional 120 days.

Please feel free to contact the undersigned if you have any questions or require any additional information.

Very truly yours,

A handwritten signature in black ink, appearing to read "THBul", followed by a large, stylized circular flourish.

Thomas H. Belknap, Jr.

THB:aea